

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GRAHAM CHASE ROBINSON,

Plaintiff and Counterclaim Defendant,

-against-

ROBERT DE NIRO,

Defendant,

and

CANAL PRODUCTIONS, INC.,

Defendant and Counterclaim Plaintiff.

Civil Action No. 1:19-CV-09156 (LJL) (KHP)

THIRD AMENDED EXHIBITS TO BE OFFERED IN
PLAINTIFF'S CASE IN CHIEF

Pursuant to the Court's Individual Rules and the Court's Order at Dkt. No. 419, Plaintiff Graham Chase Robinson respectfully submits the following amended list of exhibits that she anticipates offering in her case in chief or rebuttal. Plaintiff reserves all rights to amend her exhibit list, including to add, remove, or amend any exhibits in light of any exhibits identified by Defendants and based on the Court's evidentiary rulings. Plaintiff reserves the right to introduce any exhibit identified by Defendants and to introduce other exhibits for purposes of impeachment or rebuttal.

Dated: October 29, 2023

Respectfully submitted,

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Counsel for Plaintiff Graham Chase Robinson

Third Amended Exhibits to Be Offered in Plaintiff's Case in Chief

Pl.'s Ex. No.	Description	Bates Nos.	Objections
1*	Text messages, 12/23/2018-12/25/2018 involving Chase Robinson and Tiffany Chen	ROBINSON00012120	
2*	Text messages, 10/26/2018 involving Chase Robinson and Tiffany Chen	ROBINSON00012273-74	
3	Emails, 4/16/2019-4/22/2019 involving Chase Robinson and Michael Kaplan (with redactions)	ROBINSON00005067-68	FRE 402 (Relevance); FRE 801-802 (Hearsay); FRE 602 (Lack of Personal Knowledge)
4	Text messages, 1/22/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048682-86	Subject to redactions of confidential information: FRE 402 (Relevance) ADVANCE RULING REQUESTED [by Plaintiff]
5*	Text messages, 3/27/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048634-37	
6*	Text messages, 3/28/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048617-19	
7	Text messages, 4/1/2019 involving Michael Kaplan and Tiffany Chen	CANAL_0047380-84	Subject to removal of certain portions due to: FRE 801-802 (Hearsay); FRE 602 (Lack of Personal Knowledge); FRE 701 (Impermissible Lay Opinion) ADVANCE RULING REQUESTED [by Plaintiff]
8*	Emails, 4/2/2019 involving Chase Robinson, Robert De Niro, Tiffany Chen, and Michael Kaplan	CANAL_0034641-42	
9*	Text messages, 4/1/2019-4/2/2019 involving Tiffany Chen and Michael Kaplan	CANAL_0047503-09	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
10	Text messages, 4/6/2019-4/7/2019 involving Michael Kaplan and Alexandra Winogora	CANAL_0047900 -01	FRE 801-802 (Hearsay) FRE 602 (Lack of Personal Knowledge)
11*	Emails, 3/27/2019 involving Chase Robinson, Tiffany Chen, Michael Kaplan, and Robert De Niro	ROBINSON00001347-49	
12*	Email, 4/2/2019 involving Chase Robinson and Robert De Niro	ROBINSON00001533	
13*	Emails, 4/2/2019 involving Chase Robinson, Robert De Niro, and Tiffany Chen	CANAL_0046685-86	
14*	Text messages, 3/5/2019-3/7/2019 involving Chase Robinson and Tom Harvey	ROBINSON00014877	
15*	Audio recording, 3/27/2019 involving Chase Robinson, Robin Chambers, Tom Harvey, and Michael Tasch	ROBINSON00007174	
16	Audio recording, 3/7/2019 involving Chase Robinson and Michael Tasch	ROBINSON00007156	FRE 402 (Relevance)
17	Email, 6/9/2019 involving Tom Harvey and Chase Robinson	ROBINSON00005222	FRE 402 (Relevance); FRE 403 (Prejudice; Confusion); FRE 408 (Compromise) Defendants contend the exhibit requires redaction of settlement communications, medical issues, and submits that the name of counsel would create confusion.
18	Emails, 6/11/2019, 7/2/2019 involving Chase Robinson, Robert De Niro, and Tom Harvey	ROBINSON00001669-70	Ok subject to redactions (<i>see</i> pages ending in 1667-1668) FRE 402 (Relevance)
19	Text messages, 6/11/2019-6/12/2019 involving Michael Kaplan, Gillian	CANAL_0047441-46	FRE 801-802 (Hearsay); FRE 402 (Relevance);

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	Spear, and Sabrina Weeks-Brittan		FRE 602 (Lack of Personal Knowledge) FRE 701 (Impermissible Lay Opinion) ADVANCE RULING REQUESTED [by Plaintiff]
20*	Text messages, 7/2/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048627-30	
21*	Tom Harvey Letter 7/11/2019	ROBINSON00005297-99	
22	Text messages, 7/26/2019 involving Tiffany Chen, Sabrina Weeks-Brittan, and Gillian Spear	CANAL_0048976-78	FRE 801-802 (Hearsay); FRE 402 (Relevance); FRE 403 (Prejudice) ADVANCE RULING REQUESTED [by Plaintiff]
23	Emails, 7/31/2019-8/13/2019 involving Chase Robinson's counsel and Canal's counsel	CANAL_0049391-98	FRE 408 (Settlement); FRE 402 (Relevance); FRE 403 (Prejudice); FRE 801-802 (Hearsay) ADVANCE RULING REQUESTED [by Plaintiff]
24*	Email, 8/2/2019 involving Sabrina Weeks-Brittan, Michael Tasch, Gillian Spear, and Michael Kaplan	CANAL_0050047	
25	Text messages, 8/2/2019 involving Gillian Spear, Sabrina Weeks Brittan, and Michael Kaplan	CANAL_0052575-79	FRE 402 (Relevance); FRE 801-802 (Hearsay) ADVANCE RULING REQUESTED [by Plaintiff]
26	Canal Productions, Inc. v. Robinson Complaint 8/17/2019	Dkt. No. 1	Subject to redactions of confidential information: FRE 402 (Relevance)
27	Canal Productions, Inc. v. Robinson Notice of Discontinuance 7/19/2021	Dkt. No. 50	FRE 402 (Relevance)
28	Text messages, 8/20/2019 involving Michael Kaplan and Mercedes Tahir	CANAL_0049479-81	FRE 801-802 (Hearsay); FRE 402 (Relevance); FRE 403 (Prejudice)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
			ADVANCE RULING REQUESTED [by Plaintiff]
29	Text messages, 8/19/2019 involving Michael Kaplan and Amy Weinblum	CANAL_0047780-81	FRE 801-802 (Hearsay); FRE 402 (Relevance); FRE 403 (Prejudice) ADVANCE RULING REQUESTED [by Plaintiff]
30	Text messages, 8/15/19-8/16/19 involving Gillian Spear, Michael Kaplan, and Sabrina Weeks-Brittan	CANAL_0048105-09	FRE 801-802 (Hearsay); FRE 402 (Relevance); FRE 403 (Prejudice)
31	Text messages, 8/20/2019 involving Gillian Spear, Sabrina Weeks-Brittan, and Tiffany Chen	CANAL_0047979-88	FRE 402 (Relevance)
32	Text messages, 8/20/2019 involving Michael Kaplan	CANAL_0047794-95	FRE 801-802 (Hearsay); FRE 402 (Relevance)
33	Documents received in response to Netflix subpoena	Netflix_0001-0000001- Netflix_0001-0000007	
34	Documents received in response to Netflix subpoena	Netflix_0001-0000017- Netflix_0001-0000521	
35	Text messages, 7/11/2019 involving Michael Kaplan and Amelia Brain	CANAL_0049181-82	FRE 801-802 (Hearsay)
36*	Emails 12/17/2014, 12/21/2015, 12/12/2016, 12/18/2017, 12/19/2018 involving Chase Robinson, Robert De Niro, Michael Tasch, and other personnel at Berdon LLP	ROBINSON00008096, ROBINSON00008228, ROBINSON00008625-36, ROBINSON00009964, ROBINSON00009969, ROBINSON00009971-72	
37	Chase Robinson Work-Related Emails 2016	ROBINSON00017788- ROBINSON00019322	FRE 402 (Relevance; Statute of Limitations); FRE 801-802 (Hearsay)
38	Chase Robinson Work-Related Emails 2015	ROBINSON00017317- ROBINSON00017785	FRE 402 (Relevance); FRE 801-802 (Hearsay)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
39	Chase Robinson Work-Related Emails 2014	ROBINSON00016830-ROBINSON00017252, ROBINSON00017254-ROBINSON00017255, ROBINSON00017258-ROBINSON00017259, ROBINSON00017263-ROBINSON00017312	FRE 402 (Relevance; Statute of Limitations); FRE 801-802 (Hearsay)
40*	Text messages, 6/17/2018 involving Chase Robinson and Michael Kaplan	CANAL_0049010-11	
41*	Emails, 2/14/2018-3/5/2018 involving Chase Robinson, Michael Tasch, and Robert De Niro	CANAL_0001433-37	
42	Canal's 6/10/2022 Letter		FRE 402 (Relevance)
43	Chase Robinson Time Records 2016	ROBINSON00001674-96	FRE 402 (Relevance; Statute of Limitations as to pages ending in 1674-75).
44*	Chase Robinson Time Records 2017	ROBINSON00001696-1748	
45*	Chase Robinson Time Records 2018	ROBINSON00001749-1810	
46*	Chase Robinson Time Records 2019	ROBINSON00001811-22	
47	Emails Reflecting Canal Office Closures 2016-2019	ROBINSON00011900, ROBINSON00017962, ROBINSON00011842, ROBINSON00011828, ROBINSON00001748, CANAL_0027346, ROBINSON00011837, ROBINSON00011839, ROBINSON00008628, CANAL_0036560	Ok <i>except</i> document ending in 17962: FRE 402 (Relevance; Statute of Limitations)
48	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007147	FRE 402 (Relevance; Statute of Limitations); FRE 403 (Prejudice) ADVANCE RULING REQUESTED [by Plaintiff]

Pl.'s Ex. No.	Description	Bates Nos.	Objections
49	Text messages, 1/3/2019 involving Chase Robinson and Robin Chambers	ROBINSON00012916	Ok to a portion, as to balance: FRE 402 (Relevance); FRE 801-802 (Hearsay)
50*	Audio recording, 3/6/2019 involving Chase Robinson and Robin Chambers	ROBINSON00007154	
51	Audio recording, 3/6/2019 involving Chase Robinson and Robin Chambers	ROBINSON00007148	FRE 403 (Relevance; Cumulative) Defendants reserve the right to object to this exhibit at trial depending on the purpose for which Plaintiff seeks to introduce it due to 73-minute recording with no time stamp nor indication of portion to be utilized.
52*	Email, 3/7/2019 involving Tiffany Chen, Chase Robinson, Robert De Niro, and Michael Tasch	CANAL_0046449	
53*	Emails, 3/4/2019 involving Chase Robinson, Tiffany Chen, Robert De Niro, and Michael Kaplan	CANAL_0034383-84	
54*	Emails, 2/28/2019, 3/1/2019 involving Chase Robinson, Tiffany Chen, and Robert De Niro	ROBINSON00014404-06	
55*	Emails, 3/14/2019 involving Chase Robinson, Tiffany Chen, Robert De Niro, Michael Kaplan, and Lulu White	CANAL_0034507-09	
56*	Emails, 3/17/2019, 3/18/2019 involving Chase Robinson, Tiffany Chen, Robert De Niro, and Lulu White	CANAL_0028282	
57*	Emails, 3/27/2019 involving Chase Robinson, Tiffany Chen, Robert De Niro, and Michael Kaplan	CANAL_0047103-06	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
58	Text message, 1/3/2019 involving Chase Robinson	ROBINSON00006220	FRE 402 (Relevance); FRE 403 (Prejudice)
59	Audio recording, 3/7/2019 involving Chase Robinson and Michael Tasch	ROBINSON00007158	Ok, subject to the redaction of confidential information due to: FRE 402 (Relevance)
60	Audio recording, 3/8/2019 involving Chase Robinson and Robin Chambers	ROBINSON00007160	Ok, subject to the redaction of confidential information due to: FRE 402 (Relevance)
61*	Canal's Non-Discrimination and Anti-Harassment Policy, 11/2018	CANAL_0051748-56	
62	Text messages, 4/2/2019 involving Michael Kaplan	CANAL_0047796-97	FRE 402 (Relevance); FRE 801-802 (Hearsay)
63	Audio recording, 4/4/2019 involving Chase Robinson and Michael Kaplan	ROBINSON00007186	FRE 402 (Relevance);
64	Emails, 4/4/2019 involving Chase Robinson, Robert De Niro, and Tiffany Chen	CANAL_0046693-94	Ok, subject to the redaction of confidential information due to: FRE 402 (Relevance)
65*	Text messages, 4/5/2019 involving Tiffany Chen and Lulu White	CANAL_0047301-03	
66*	Email, 4/6/2019 involving Tiffany Chen, Lulu White, Robert De Niro, Gillian Spear, and Sabrina Weeks-Brittan	CANAL_0036475	
67*	Emails, 4/4/2019, 4/5/2019 involving Chase Robinson, Robert De Niro, and Tiffany Chen	CANAL_0046696-97	
68*	Email, 4/6/2019 involving Tiffany Chen, Lulu White, Robert De Niro, Gillian	ROBINSON00013839	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	Spear, and Sabrina Weeks-Brittan		
69*	Emails, 4/6/2019 involving Graham Chase Robinson, Robert De Niro, Tom Harvey, Michael Tasch, John Hackett, and Mark Bosswick	ROBINSON00001641	
70	Email, 6/11/2019 involving Chase Robinson, Robert De Niro, and Tom Harvey	ROBINSON00001667-68	Subject to portions requiring redaction due to: FRE 402 (Relevance); FRE 403 (Prejudice) ADVANCE RULING REQUESTED [by Plaintiff]
71	Emails, 5/7/2019-5/16/2019 involving Chase Robinson and Tom Harvey	ROBINSON00005129-31	FRE 402 (Relevance) ADVANCE RULING REQUESTED [by Plaintiff]
72*	Emails, 6/4/2019 involving Chase Robinson, Robert De Niro, and Tom Harvey	CANAL_0049267	
73*	Canal's 30(b)(6) Declaration 9/7/2022		
74*	Emails, 4/9/2019 involving Chase Robinson and Tom Harvey	ROBINSON00016576	
75*	Text messages, 4/6/2019 involving Tiffany Chen, Gillian Spear, and Sabrina Weeks-Brittan	CANAL_0048185-87	
76*	Canal's Offer Letter to Gillian Spear, 3/10/2017	CANAL_0002444-45	
77	Tax documents, 2013-2018 for Graham Chase Robinson and Daniel Harvey	CANAL_0052643-44, CANAL_0052647-48, CANAL_0052651-52, CANAL_0052655-56, CANAL_0052659-60, CANAL_0052663-64	Ok for Plaintiff's W2s, as to the balance: FRE 402 (Relevance)
78*	Emails, 4/24/2017, 4/25/2017 involving Chase Robinson and Robert De Niro	CANAL_0018410	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
79	Emails, 2/8/2019 involving Chase Robinson, Michael Tasch, and Tom Harvey	ROBINSON00013514	FRE 402 (Relevance); FRE 403 (Prejudice); FRE 502 (Attorney-Client Privilege)
80*	Email, 2/26/2019 involving Chase Robinson, Tiffany Chen, and Robert De Niro	ROBINSON00014384	
81*	Emails, 3/11/2019 involving Chase Robinson, Tiffany Chen, Robert De Niro, Michael Tasch, and Tom Harvey	ROBINSON00014824	
82*	Emails, 3/1/2019 involving Chase Robinson, Tiffany Chen, and Robert De Niro	CANAL_0023021-23	
83	Text message, 4/2/2019 involving Chase Robinson	ROBINSON00006433	FRE 402 (Relevance)
84*	Text message, 3/11/2018 involving Chase Robinson and Robin Chambers	ROBINSON00011009	
85*	Text message, 3/11/2018 involving Chase Robinson and Robin Chambers	ROBINSON00011010	
86*	Email, 3/9/2018 involving Chase Robinson	ROBINSON00010403-05	
87*	Emails, 3/6/2018, 3/7/2018, 3/9/2018 involving Chase Robinson and Gillian Spear	CANAL_0025442-43	
88*	Text messages, 4/13/2019 involving Michael Kaplan and Olivia Jampol	CANAL_0047848-50	
89*	Emails, 12/11/2017, 12/23/2017, and 12/24/2017 involving Chase Robinson and Robert De Niro	CANAL_0045968-69	
90	Severance, Waiver and Release Agreement 6/9/2019	ROBINSON00005223-28	FRE 402 (Relevance); FRE 403 (Prejudice); FRE 408 (Compromise)
91	Text messages, 4/4/2019-4/5/2019 involving	CANAL_0047511-18	FRE 402 (Relevance)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	Michael Kaplan, Gillian Spear, and Sabrina Weeks-Brittan		
92*	Emails, 3/8/2019 involving Tiffany Chen, Chase Robinson, Robert De Niro, Michael Tasch, and Michael Kaplan	ROBINSON00014518	
93	Text messages, 3/29/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048741-43	OK, subject to exclusion of what "May" said due to: FRE 801-802 (Hearsay)
94	Text messages, 3/31/2019-4/1/2019 involving Michael Kaplan and Gillian Spear	CANAL_0047829-34	OK, subject to exclusion of portion due to: FRE 801-802 (Hearsay); FRE 602 (Lack of Personal Knowledge)
95*	Text messages, 4/2/2019-4/3/2019 involving Michael Kaplan and Tiffany Chen	CANAL_0047432-36	
96	Text messages, 4/4/2019 involving Michael Kaplan and Michael Tasch	CANAL_0047462-64	FRE 801-802 (Hearsay)
97*	Text messages, 4/4/2019 involving Tiffany Chen, Gillian Spear, and Sabrina Weeks-Brittan	CANAL_0049474-78	
98*	Emails, 4/4/2019-4/6/2019 involving Tiffany Chen, Robert De Niro, Michael Tasch, and Mark Bosswick	CANAL_0046705-08	
99	Text messages, 4/6/2019-4/7/2019 involving Michael Kaplan and Christine O'Leary	CANAL_0047485-87	FRE 402 (Relevance); FRE 801-802 (Hearsay)
100*	Text messages, 4/6/2019 involving Michael Kaplan and Morgan Billington	CANAL_0047798-99	
101	Canal Letter, 5/25/2022 regarding Vacation Claims, Petty Cash Receipts,	N/A	FRE 402 (Relevance)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	General Ledger, Flip Phone Status		
102*	Email, 4/6/2019 involving Chase Robinson, Robert De Niro, and Tiffany Chen	CANAL_0046709-10	
103*	Sabrina Weeks Brittan Petty Cash Sheet 2018-2019	ROBINSON00009434-42	
104	Chase Petty Cash Sheet 4/2017-1/2019	CANAL_0052890-900	FRE 402 (Relevance)
105*	Email, 4/9/2019 involving Tom Harvey, Robert De Niro, and Chase Robinson	ROBINSON00008927	
106	Text messages, 4/11/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048605-10	FRE 402 (Relevance)
107*	Email, 7/3/2019 involving Gillian Spear and Tom Harvey	CANAL_0050157-58	
108	Text messages, 8/2/2019-8/3/2019 involving Michael Kaplan, Sabrina Weeks-Brittan, and Gillian Spear	CANAL_050127-31	FRE 402 (Relevance) Defendants reserve the right to object based on what portion Plaintiff seeks to introduce, as bate-stamped nos. do not align with description.
109*	Text messages, 11/25/18-11/26/2018 involving Chase Robinson and Sabrina Weeks-Brittan	ROBINSON00011980-81	
110	Text messages, 4/8/2019-4/9/2019 involving Tiffany Chen and Michael Kaplan	CANAL_0047465-71	Defendants reserve right to object based on what portion Plaintiff seeks to introduce. Certain portions are acceptable; as to balance: FRE 402 (Relevance)
111	Email, 3/22/2016 involving Chase Robinson and Robert De Niro	ROBINSON00012593	FRE 402 (Relevance)
112	Email 6/2/2016, involving Chase Robinson and Robert De Niro	ROBINSON00008260	FRE 402 (Relevance)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
113	Email, 10/15/2016 involving Chase Robinson and Robert De Niro	ROBINSON00012589	FRE 402 (Relevance)
114	Text messages, 9/3/2016-9/9/2016 involving Chase Robinson and Robert De Niro	ROBINSON00008946	FRE 402 (Relevance)
115	Text messages, 2/19/2016 involving Chase Robinson and Katherine Wernet	ROBINSON00009658	FRE 402 (Relevance; Statute of Limitations)
116*	Emails, 3/1/2019 involving Chase Robinson and Robert De Niro	ROBINSON00000639	
117	Email, 11/22/2014 involving Chase Robinson and Robert De Niro	ROBINSON00002008	FRE 402 (Relevance; Statute of Limitations)
118*	Email, 2/21/2019 involving Chase Robinson and Robert De Niro	ROBINSON00000565	
119	Defendants' Statement of Damages and Computations, 2/7/2022		FRE 402 (Relevance); FRE 403 (Prejudice)
120	Defendants' Amended Statement of Damages and Computations, 6/10/2022		FRE 402 (Relevance); FRE 403 (Prejudice)
121	Defendants' Second Amended Statement of Damages and Computations, 8/16/2022		FRE 402 (Relevance); FRE 403 (Prejudice)
122	Text message, 1/19/2019 involving Chase and Bryan Zak	ROBINSON00006301	FRE 402 (Relevance)
123	Defendants' Responses to Plaintiff's First Set of Interrogatories, 3/6/2020		FRE 402 (Relevance); FRE 403 (Cumulative)
124	Defendants' Verification of Defendants' Responses to Plaintiff's First Set of Interrogatories, 3/19/2020		FRE 402 (Relevance); FRE 403 (Cumulative)
125	Defendants' Amended Responses to Plaintiff's First Set of Interrogatories, 6/22/2020		FRE 402 (Relevance); FRE 403 (Cumulative)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
126	Defendants' Verification of Defendants' Amended Responses to Plaintiff's First Set of Interrogatories, 9/30/2020		FRE 402 (Relevance); FRE 403 (Cumulative)
127	Defendants' Responses to Plaintiff's Second Set of Interrogatories, 3/26/2021		FRE 402 (Relevance); FRE 403 (Cumulative)
128	Defendants' Amended Responses to Plaintiff's Second Set of Interrogatories, 5/25/2022		FRE 402 (Relevance); FRE 403 (Cumulative)
129	Defendants' Second Amended Responses to Plaintiff's Second Set of Interrogatories, 6/10/2022		FRE 402 (Relevance); FRE 403 (Cumulative)
130	Defendants' Third Amended Responses to Plaintiff's Second Set of Interrogatories, 7/27/2022		FRE 402 (Relevance); FRE 403 (Cumulative)
131	Plaintiff's Responses to Defendants' First Set of Interrogatories, 4/7/2020		FRE 402 (Relevance); FRE 403 (Cumulative)
132	Plaintiff's Supplemental Response to Defendants' Interrogatory No. 11, 2/22/2021		FRE 402 (Relevance); FRE 403 (Cumulative)
133	Plaintiff's Supplemental Responses to Defendants' Interrogatories, 12/16/2021		FRE 402 (Relevance); FRE 403 (Cumulative)
134	Plaintiff's Objections and Responses to Defendants' Second Set of Interrogatories, 2/7/2022		FRE 402 (Relevance); FRE 403 (Cumulative)
135*	Draft Letter of Recommendation for Chase Robinson, 6/2/2019	ROBINSON00001662	
136*	Email, 4/13/2015 involving Michael Kaplan and Nellie Norden	CANAL_0030926	
137*	Emails, 1/22/2018 involving Michael Kaplan, Michael Tasch, Victoria	CANAL_0045358-60	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	DeVincenzo, and Robert De Niro		
138	Text messages, 6/6/2019-6/7/2019 involving Michael Kaplan, Sabrina Weeks-Brittan, and Gillian Spear	CANAL_0047395-404	FRE 402 (Relevance); FRE 801-802 (Hearsay)
139	Text messages, 10/6/2019 involving Michael Kaplan, Alexandra Winogora, and Nellie Norden	CANAL_0047423-27	FRE 402 (Relevance); FRE 408 (Hearsay) FRE 403 (Prejudice)
140	Text messages, 1/6/2019-1/7/2019 involving Michael Kaplan and Chase Robinson	CANAL_0047668-69	FRE 402 (Relevance); FRE 801-802 (Hearsay); FRE 403 (Cumulative; Duplicative)
141	Text messages, 4/1/2019-4/2/2019 involving Michael Kaplan and Gillian Spear	CANAL_0047918-23	FRE 402 (Relevance); FRE 801-802 (Hearsay)
142	Text messages, 1/9/2019 involving Michael Kaplan and Chase Robinson	CANAL_0049058-60	FRE 402 (Relevance)
143	Text messages, 10/26/2019 involving Michael Kaplan and Drena De Niro	CANAL_0049169-71	FRE 402 (Relevance)
144	Text messages, 4/17/2019 involving Michael Kaplan and Amelia Brain	CANAL_0049210-11	FRE 402 (Relevance)
145	Emails, 7/8/2019 involving Michael Kaplan, Michael Tasch, and Tom Harvey	CANAL_0050288-89	FRE 402 (Relevance) Defendants reserve the right to object based on what portion to be entered.
146	Email, 9/13/2013 involving Michael Kaplan, Victoria DeVincenzo, Michael Tasch, and Chase Robinson	ROBINSON00008022	FRE 402 (Relevance)
147*	Email, 6/3/2019 involving Michael Kaplan, Tiffany Chen, Robert De Niro, and Michael Tasch	CANAL_0030806-07	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
148	Email, 7/16/2014 involving Chase Robinson and Robert De Niro	CANAL_0038698	FRE 403 (Cumulative; Duplicative of Robinson production ending in 1920)
149	Email, 7/18/2017 involving Chase Robinson and Robert De Niro	CANAL_0045910	FRE 403 (Cumulative; Duplicative of Robinson production ending in 2608)
150*	Emails, 12/18/2018-12/28/2018 involving Chase Robinson and Robert De Niro (with redactions)	CANAL_0046031-32	
151*	Email, 1/3/2019 involving Chase Robinson and Robert De Niro	CANAL_0046038	
152*	Email, 1/10/2019 involving Chase Robinson, Tiffany Chen, and Robert De Niro	CANAL_0046051	
153	Email, 7/15/2013 involving Chase Robinson and Mark Bosswick	ROBINSON00011063	FRE 402 (Relevance)
154	Emails, 7/15/2013 involving Chase Robinson and Robert De Niro	ROBINSON00011064	FRE 402 (Relevance)
155*	Emails, 4/2/2019 involving Chase Robinson, Robert De Niro, and Tiffany Chen	CANAL_0046683-84	
156*	Emails, 4/4/2019-4/6/2019 involving Tiffany Chen, Michael Tasch, Robert De Niro, and Mark Bosswick	CANAL_0046702-04	
157*	Email, 4/8/2019 involving Tiffany Chen and Michael Tasch	CANAL_0046715	
158*	Emails, 4/6/2019 involving Chase Robinson, Robert De Niro, and Tiffany Chen	CANAL_0047109-11	
159*	Email, 4/4/2019 involving Chase Robinson and Robert De Niro	ROBINSON00001602	
160*	Text message, 3/19/2017 involving Chase Robinson and Robert De Niro	ROBINSON00005720	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
161*	Text messages, 1/19/2019 involving Chase Robinson and Tiffany Chen	ROBINSON00008953	
162*	Emails, 12/19/2018 involving Chase Robinson and Robert De Niro	ROBINSON00009966-67	
163*	Text messages, 11/23/2018 involving Chase Robinson and Tiffany Chen (with redactions)	ROBINSON00012055	
164*	Email, 7/20/2017 involving Mark Bosswick, Michael Tasch, Chase Robinson, and Francesca Commisso	CANAL_0001844	
165	Text messages, 1/19/2019 involving Michael Kaplan and Tiffany Chen	CANAL_0047500-02	FRE 402 (Relevance)
166*	Text messages, 7/11/2019 involving Tiffany Chen and Sabrina Weeks-Brittan	CANAL_0048009-11	
167	Text messages, 5/17/2019 involving Tiffany Chen, Gillian Spear, Sabrina Weeks-Brittan, and Kevin Rivas	CANAL_0048017-19	FRE 402 (Relevance)
168	Text messages, 6/15/2019 involving Tiffany Chen and Sabrina Weeks-Brittan	CANAL_0048028-30	FRE 402 (Relevance)
169	Text messages, 2/13/2020 involving Tiffany Chen, Gillian Spear, Sabrina Weeks-Brittan, and Kevin Rivas	CANAL_0048031-33	FRE 402 (Relevance)
170	Text messages, 4/6/2019-4/7/2019 involving Tiffany Chen, Gillian Spear, Sabrina Weeks-Brittan, and Kevin Rivas	CANAL_0048188-90	FRE 402 (Relevance)
171	Text messages, 12/3/2018 involving Robert De Niro and Tiffany Chen	CANAL_0048658-61	FRE 402 (Relevance)
172	Text messages, 12/6/2018 involving Robert De Niro and Tiffany Chen	CANAL_0048687-92	Ok solely as to document CANAL_0048688, the balance to be excluded:

Pl.'s Ex. No.	Description	Bates Nos.	Objections
			FRE 402 (Relevance)
173	Text messages, 1/19/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048753-54	FRE 402 (Relevance)
174	Text messages, 6/27/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048796-99	FRE 402 (Relevance) FRE 403 (Prejudice)
175*	Text messages, 5/21/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048805-07	
176	Text messages and emails, 9/12/2019-9/13/2019, 9/1/2020 involving Tom Harvey and Kelly Thomas	CANAL_0049482-86	FRE 402 (Relevance) Defendants reserve the right to object based on what portion Plaintiff seeks to introduce and the basis for such introduction.
177	Email, 6/26/2019 involving Tiffany Chen and Robert De Niro	CANAL_049787-93	FRE 402 (Relevance) FRE 403 (Prejudice) ADVANCE RULING REQUESTED [by Plaintiff]
178	Email, 8/26/2014 involving Chase Robinson and Robert De Niro	ROBINSON00012639	FRE 402 (Relevance)
179	Email, 1/28/2014 involving Chase Robinson and Robert De Niro	ROBINSON00012645	FRE 402 (Relevance)
180*	Text messages, 9/29/2018-10/12/2018 involving Robert De Niro and Chase Robinson	ROBINSON00012840-44	
181	Emails, 5/26/2016-5/31/2016 involving Chase Robinson and Peter Grant	ROBINSON00012859-62	FRE 402 (Relevance)
182	Emails, 5/11/2016-6/1/2016 involving Chase Robinson, Mandy Spencer-Phillips, and Phil Glasser	ROBINSON00012863-67	FRE 402 (Relevance)
183	Emails, 11/26/2018-11/27/2018 involving Chase Robinson, Lulu White, and Rachel Humphreys	ROBINSON00012893	FRE 402 (Relevance)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
184	Emails, 11/29/2018-11/30/2018 involving Chase Robinson and Lulu White	ROBINSON00012898-99	FRE 402 (Relevance)
185	Text messages, 8/24/2016-8/25/2016 involving Chase Robinson and Robin Chambers	ROBINSON00012943	FRE 402 (Relevance)
186	Text message, 8/8/2017 involving Chase Robinson and Robert De Niro	ROBINSON00012948	FRE 402 (Relevance)
187*	Text messages, 11/24/2018-11/25/2018 involving Chase Robinson and Robert De Niro	ROBINSON00012954	
188*	Text messages, 3/20/2019-3/22/2019 involving Chase Robinson and Robert De Niro	ROBINSON00012957	
189	Text messages, 2/22/2018 involving Chase Robinson and Robin Chambers	ROBINSON00012960	FRE 402 (Relevance); FRE 403 (Prejudice)
190*	Text messages, 3/14/2018 involving Chase Robinson and Robin Chambers	ROBINSON00012961	
191*	Text message, 1/5/2019 involving Chase Robinson and Michael Kaplan	ROBINSON00013217	
192	Emails, 4/1/2014 involving Chase Robinson	ROBINSON00013271	FRE 402 (Relevance); FRE 801-802 (Hearsay)
193	Emails, 12/17/2014 involving Chase Robinson, Robert De Niro, Maria Palazon Huet, Amelia Brain, Carolyn Tiley, Zoila Gomez	ROBINSON00013272	FRE 402 (Relevance); FRE 801-802 (Hearsay); FRE 602 (Lack of Personal Knowledge)
194	Dan Harvey Canal Paystubs 1/1/2016-4/27/202	CANAL_0049314-36	FRE 402 (Relevance; Statute of Limitations);
195	Email, 10/15/2011 involving Chase Robinson and Robert De Niro	ROBINSON00010869	FRE 402 (Relevance) ADVANCE RULING REQUESTED [by Plaintiff]

Pl.'s Ex. No.	Description	Bates Nos.	Objections
196	Dr. Robert Goldstein Expert Report, 2/17/2022		
197	Email, 5/8/2015 involving Chase Robinson and Robert De Niro	ROBINSON00008129	FRE 402 (Relevance)
198	Email, 11/24/2015 involving Chase Robinson and Robert De Niro	ROBINSON00008218	FRE 402 (Relevance)
199	Email, 12/23/2015 involving Chase Robinson, Robert De Niro, Nellie Norden, and Katherine Wernet	ROBINSON00008229	FRE 402 (Relevance)
200	Email, 2/24/2016 involving Chase Robinson, Robert De Niro, Katherine Wernet, and Michael Kaplan	ROBINSON00008245	FRE 402 (Relevance)
201	Email, 2/27/2016 involving Chase Robinson and Robert De Niro.	ROBINSON00008248	FRE 402 (Relevance)
202	Email, 6/3/2016 involving Chase Robinson and Robert De Niro	ROBINSON00008262	FRE 402 (Relevance)
203	Emails, 9/5/2016 involving Chase Robinson and Robert De Niro	ROBINSON00008270	FRE 402 (Relevance)
204	Email, 9/9/2016 involving Chase Robinson and Robert De Niro	ROBINSON00008271	FRE 402 (Relevance)
205	Emails, 11/24/2016- 11/25/2016 involving Chase Robinson and Robert De Niro	ROBINSON00008320	FRE 402 (Relevance)
206	Email, 11/29/2016 involving Chase Robinson and Robert De Niro	ROBINSON00008321	FRE 402 (Relevance)
207	Email, 12/17/2016 involving Chase Robinson and Robert De Niro	ROBINSON00008326	FRE 402 (Relevance)
208	Emails, 12/17/2016 involving Chase Robinson and Robert De Niro	ROBINSON00008327	FRE 402 (Relevance)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
209	Email, 12/30/2016 involving Chase Robinson and Robert De Niro	ROBINSON00008328	FRE 402 (Relevance)
210	Emails, 1/1/2017 involving Chase Robinson and Robert De Niro	ROBINSON00008329	FRE 402 (Relevance)
211	Emails, 3/26/2017 involving Chase Robinson and Robert De Niro	ROBINSON00008343	FRE 402 (Relevance)
212*	Emails, 4/1/2017-5/2/2017 involving Chase Robinson and Robert De Niro	ROBINSON00008358	
213	Emails, 7/8/2017 involving Chase Robinson and Robert De Niro	ROBINSON00008373	FRE 402 (Relevance)
214	Emails, 9/26/2017 involving Chase Robinson and Robert De Niro	ROBINSON00008392	FRE 402 (Relevance)
215	Email, 11/12/2017 involving Chase Robinson and Robert De Niro	ROBINSON00008406	FRE 402 (Relevance)
216	Emails, 11/27/2017 involving Chase Robinson and Robert De Niro	ROBINSON00008466	FRE 402 (Relevance)
217*	Emails, 1/19/2018-2/13/2018 involving Chase Robinson, Michael Tasch, and Robin Chambers	ROBINSON00008493-94	
218	Email, 2/27/2018 involving Chase Robinson and Robert De Niro	ROBINSON00008501	FRE 402 (Relevance)
219	Emails, 2/14/2018-3/5/2018 involving Chase Robinson, Michael Tasch, and Robert De Niro.	ROBINSON00008510-18	FRE 403 (Duplicative; Illegible)
220*	Emails, 5/9/2018 involving Chase Robinson and Robert De Niro	ROBINSON00008524	
221*	Emails, 4/1/2018 involving Chase Robinson and Robert De Niro	ROBINSON00008531	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
222	Emails, 7/3/2018 involving Chase Robinson and Robert De Niro	ROBINSON00008556	FRE 402 (Relevance)
223	Email, 7/6/2018 involving Chase Robinson and Robert De Niro	ROBINSON00008558	FRE 402 (Relevance)
224	Email, 7/10/2018 involving Chase Robinson and Robert De Niro	ROBINSON00008559	FRE 402 (Relevance)
225	Email 9/28/2018 involving Chase Robinson and Robert De Niro	ROBINSON00008584	FRE 402 (Relevance)
226	Email, 10/17/2018 involving Chase Robinson and Robert De Niro	ROBINSON00008587	FRE 402 (Relevance)
227	Email, 12/24/2018 involving Chase Robinson and Robert De Niro	ROBINSON00008631	FRE 402 (Relevance)
228*	Text messages, 3/4/2018 involving Chase Robinson and Juanita Contreras	ROBINSON00008943	
229	Text messages, 3/6/2018-3/7/02018 involving Chase Robinson and Robert De Niro	ROBINSON00008945	FRE 402 (Relevance) ADVANCE RULING REQUESTED [by Plaintiff]
230	Text messages, 1/25/2018 involving Chase Robinson and Amelia Brain	ROBINSON00009331	FRE 402 (Relevance); FRE 801-802 (Hearsay)
231*	Email, 9/19/2018 involving Chase Robinson	ROBINSON00009384	
232*	Text messages, 3/15/2019 involving Lulu White and Chase Robinson	ROBINSON00009659	
233	Text messages, 9/7/2016 involving Chase Robinson and Morgan Billington	ROBINSON00009660	FRE 402 (Relevance); FRE 408 (Hearsay)
234*	Emails, 11/18/2018-01/03/2019, involving Chase Robinson and Michael Tasch	ROBINSON00010107-08	
235*	Emails, 2/22/2018-2/28/2018 involving Chase	ROBINSON00010378-79	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	Robinson and James Imbriani		
236*	Email, 1/26/2019 from Chase Robinson to herself	ROBINSON00010158	
237	Emails, 3/4/2018 involving Chase Robinson and Robert De Niro	ROBINSON00010390	FRE 402 (Relevance) ADVANCE RULING REQUESTED [by Plaintiff]
238*	Email, 2/22/2018-3/9/2018 involving Chase Robinson and Amelia Brain	ROBINSON00010391-93	
239*	Emails, 3/11/2018-3/12/2018 involving Chase Robinson and Robert De Niro	ROBINSON00010396	
240*	Emails, 2/28/2018-3/9/2018, involving Chase Robinson and James Imbriani	ROBINSON00010399-402	
241	Text messages, 9/7/2016, text involving Chase Robinson and Morgan Billington	ROBINSON00010740	FRE 402 (Relevance); FRE 408 (Hearsay)
242	Emails, 7/7/2017-7/10/2017, Chase Robinson and Gigi Vega	ROBINSON00010901-02	FRE 402 (Relevance)
243	Emails, 8/2/2018-8/3/2018, Chase Robinson and Justine Conte	ROBINSON00010977-85	FRE 402 (Relevance); FRE 403 (Illegible; Cumulative)
244	Emails, 5/23/2018-5/24/2018, involving Chase Robinson and Katherine Stroud	ROBINSON00010988-90	FRE 402 (Relevance)
245*	Emails, 10/10/2018-10/22/2018, involving Chase Robinson and Michael Tasch	ROBINSON00010103	
246*	Emails, 3/12/2019-3/13/2019, involving Lulu White and Chase Robinson	ROBINSON00010661	
247	Email, 3/19/2017, involving Chase Robinson,	ROBINSON00010662	FRE 402 (Relevance)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	Robert De Niro, and Grace De Niro		
248*	Text messages, 3/19/2017, involving Chase Robinson and Robert De Niro	ROBINSON00010663	
249*	Text messages, 3/26/2017, involving Chase Robinson and Robert De Niro	ROBINSON00010664	
250*	Receipt from Paola's, 1/24/2018	ROBINSON00010737	
251*	Text messages, 3/11/2018, involving Robin Chambers and Chase Robinson	ROBINSON00011010	
252*	Text messages, 3/11/2018, involving Michael Kaplan and Chase Robinson	ROBINSON00011012	
253*	Text messages, 1/22/2018, involving Michael Kaplan and Chase Robinson	ROBINSON00011102	
254*	Receipts, 3/8/2018-3/9/2018	ROBINSON00011111-14	
255	Email, 3/12/2018, involving Chase Robinson, Gillian Spear, and Morgan Billington	ROBINSON00011122-25	Subject to redactions given confidential information: FRE 402 (Relevance)
256*	Emails, 2/21/2018, involving Chase Robinson and James Imbriani	ROBINSON00011142	
257*	Itinerary	ROBINSON00011147	
258*	Text messages, 3/11/2018, involving Chase Robinson and Amelia Brain	ROBINSON00011152-54	
259*	Text messages, 3/11/2018, involving Chase Robinson and Juanita Contreras	ROBINSON00011155-57	
260	Emails, 3/6/2018-3/7/2018, involving Elizabeth McGuire and Chase Robinson	ROBINSON00011161-63	Subject to redactions given confidential information: FRE 402 (Relevance)
261*	Emails, 3/14/2018-3/20/2018, involving Chase Robinson, Morgan	ROBINSON00011180-83	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	Billington, Gillian Spear, and James Imbriani		
262*	Email, 2/21/2018, involving Chase Robinson, Morgan Billington, Michael Kaplan, Gillian Spear, and Amelia Brain	ROBINSON00011190-91	
263*	Emails, 2/16/2018- 2/22/2018, involving Chase Robinson, Morgan Billington, Michael Kaplan, Gillian Spear, and Amelia Brain	ROBINSON00011192-93	
264*	Email, 3/6/2018, involving Chase Robinson and Robert De Niro	ROBINSON00011215	
265	Email, 8/25/2017, Chase Robinson to herself	ROBINSON00011245-46	FRE 402 (Relevance); FRE 801-802 (Hearsay)
266	Picture of Taxi Driver Books	ROBINSON00011258	FRE 402 (Relevance); FRE 1002 (Best Evidence)
267	Emails, 1/5/2018-1/7/2018, involving Chase Robinson and Gillian Spear	ROBINSON00011265-70	Subject to redactions of confidential information: FRE 402 (Relevance); FRE 801-802 (Hearsay)
268	Text messages, 1/12/2019, involving Chase Robinson and De Niro	ROBINSON00011752-54	FRE 402 (Relevance)
269*	Text messages, 7/31/2017, involving Gillian Spear and Chase Robinson	ROBINSON00012008	
270*	Text messages, 7/19/2017, involving Drena De Niro and Chase Robinson	ROBINSON00012010	
271*	Text messages, 12/4/2018, involving Robert De Niro and Chase Robinson	ROBINSON00012059	
272	Text messages, 12/4/2018, involving Robert De Niro and Chase Robinson	ROBINSON00012060	FRE 402 (Relevance)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
273	Text messages, 3/5/2018, involving Robin Chambers and Chase Robinson	ROBINSON00012156	FRE 402 (Relevance)
274*	Text messages, 9/24/2018, involving Michael Kaplan, Rachel Humphreys, and Lulu White	ROBINSON00012226	
275*	Receipts, 3/27/2017-3/28/2017	ROBINSON00012522	
276	Email, 2/12/2015, involving Chase Robinson and Robert De Niro	ROBINSON00012591	FRE 402 (Relevance; Statute of Limitations)
277	Emails, 8/8/2017, involving Chase Robinson and Robert De Niro	ROBINSON00012592	FRE 402 (Relevance)
278	Email, 3/22/2016, involving Chase and Robert De Niro	ROBINSON00012593	FRE 402 (Relevance)
279	Email, 4/4/2016, involving Chase Robinson and Robert De Niro	ROBINSON00012594	FRE 402 (Relevance)
280	Email, 8/26/2013, involving Chase Robinson and Robert De Niro	ROBINSON00012604	FRE 402 (Relevance; Statute of Limitations)
281	Email, 9/4/2012-9/5/2012, involving Chase Robinson and Robert De Niro	ROBINSON00012626	FRE 402 (Relevance; Statute of Limitations)
282	Emails, 2/28/2014, involving Chase Robinson and Robert De Niro	ROBINSON00012632	FRE 402 (Relevance; Statute of Limitations)
283	Email, 9/24/2014, involving Chase Robinson and Robert De Niro	ROBINSON00012637	FRE 402 (Relevance; Statute of Limitations)
284	Email, 8/26/2014, involving Chase Robinson and Robert De Niro	ROBINSON00012639	FRE 402 (Relevance; Statute of Limitations)
285	Email, 2/14/2018- 3/5/2018 with Chase, Robert De Niro, and Michael Tasch	ROBINSON00006885-88	The exhibit does not match production documents and otherwise appears to be a duplicate of CANAL 1433-1437: FRE 403 (Cumulative; Duplicative)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
			ADVANCE RULING REQUESTED [by Plaintiff]
286	Email, 1/3/2023 with Chase and Michael Kaplan	ROBINSON00006893	FRE 402 (Relevance; Statute of Limitations)
287	Email, 5/17/2012-5/18/2012 involving Chase and Michael Kaplan	ROBINSON00006894	FRE 402 (Relevance; Statute of Limitations)
288	Email, 1/9/2015- 1/12/2015 involving Chase and Robert De Niro	ROBINSON00006904	FRE 402 (Relevance; Statute of Limitations)
289	Email, 1/14/2015 involving Chase Robinson and Robert De Niro	ROBINSON00006905	FRE 402 (Relevance; Statute of Limitations)
290	Email, 7/21/2014 involving Chase Robinson and Robert De Niro	ROBINSON00006906	FRE 402 (Relevance; Statute of Limitations)
291	Email, 1/23/2015 involving Chase Robinson and Robert De Niro	ROBINSON00006907	FRE 402 (Relevance; Statute of Limitations)
292	Email, 10/18/2016-10/20/2016 involving Chase Robinson, Francesca Commisso (Berdon), Michael Kaplan, and Michael Tasch	ROBINSON00006933-34	FRE 402 (Relevance)
293	Email, 1/17/2017 involving Chase Robinson, Francesca Commisso (Berdon), and Michael Kaplan	ROBINSON00006935	FRE 402 (Relevance)
294	Email, 8/21/2017 involving Francesca Commisso (Berdon) and Chase Robinson	ROBINSON00006936	FRE 402 (Relevance) ADVANCE RULING REQUESTED [by Plaintiff]
295	Email, 3/27/2019 involving Chase Robinson and Michael Tasch	ROBINSON00006937	FRE 402 (Relevance)
296*	Text message, 6/17/2018-6/18/2018 involving Chase Robinson and Michael Kaplan	ROBINSON00006959	
297*	Email, 11/28/2018-1/4/2019 involving	ROBINSON00006962-63	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	Michael Tasch and Chase Robinson		
298*	Email, 10/10/2018-10/29/2018 involving Michael Tasch and Chase Robinson	ROBINSON00006966-67	
299*	Email, 11/20/2018-11/27/2018 involving Chase Robinson and Michael Tasch	ROBINSON00006968	
300*	Email, 11/19/2018 involving Michael Kaplan and Chase Robinson	ROBINSON00006969	
301	Email, 1/29/2019 involving Chase Robinson and Robert De Niro	ROBINSON00007011	FRE 402 (Relevance; Cumulative; Duplicative)
302	Email, 2/22/2018 involving Chase Robinson, Robert De Niro, and Michael Kaplan	ROBINSON00007012	FRE 402 (Relevance; Cumulative; Duplicative)
303	Email, 2/9/2018 involving Chase Robinson and Robert De Niro	ROBINSON00007013	FRE 402 (Relevance; Cumulative; Duplicative)
304	Email, 2/23/2016 involving Chase Robinson and Robert De Niro	ROBINSON00007014	FRE 402 (Relevance; Cumulative; Duplicative)
305	Email, 10/4/2017 involving Chase Robinson and Robert De Niro	ROBINSON00007015	FRE 402 (Relevance; Cumulative; Duplicative)
306	Email, 4/1/2017 involving Chase Robinson and Robert De Niro	ROBINSON00007016	FRE 402 (Relevance; Cumulative; Duplicative)
307	Email, 2/26/2019 involving Chase Robinson and James Imbriani	ROBINSON00007018	FRE 402 (Relevance; Cumulative; Duplicative)
308	Email, 2/3/2019 to 2/12/2019 involving Chase Robinson and Margaret Mary Murray	ROBINSON00007019-20	FRE 402 (Relevance; Cumulative; Duplicative)
309	Text messages, 2/6/2019 involving Chase Robinson and Robin Chambers	ROBINSON00007022	FRE 402 (Relevance; Cumulative; Duplicative)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
310	Email, 2/11/2019 involving Chase Robinson and Robert De Niro	ROBINSON00007023	FRE 402 (Relevance)
311	Email, 2/23/2019 involving Chase Robinson and Robert De Niro	ROBINSON00007024	FRE 402 (Relevance)
312	Email, 1/3/2019 involving Chase Robinson and Robert De Niro	ROBINSON00007033	Defendants reserve the right to object based on what portion to be entered, as the document is seemingly missing.
313	Text message, 1/3/2019 involving Chase Robinson and Marianna Shafran	ROBINSON00007034	FRE 402 (Cumulative; Duplicative)
314	Email, 1/10/2019-1/11/2019 involving Robin Chambers, Chase Robinson, Tiffany Chen, and Robert De Niro	ROBINSON00007037	FRE 402 (Cumulative; Duplicative)
315	Text message, 1/10/2019 involving Juanita Contreras and Chase Robinson	ROBINSON00007038	Subject to removal of portion due to: FRE 801-802 (Hearsay) FRE 602 (Lack of Personal Knowledge; Foundation)
316	Text message, 1/10/2019 involving Robin Chambers and Chase Robinson	ROBINSON00007039-42	FRE 801-802 (Hearsay) FRE 602 (Lack of Personal Knowledge)
317*	Email, 3/5/2019 involving Chase Robinson, Michael Tasch, Tom Harvey, John Hackett, Robert De Niro and Tiffany Chen	ROBINSON00007055	
318	Text message, 3/5/2019-3/7/2019 involving Chase Robinson and Robin Chambers	ROBINSON00007056-58	Ok as to page 7058, and as to balance: FRE 402 (Relevance); FRE 801-802 (Hearsay)
319*	Email, 3/8/2019 involving Michael Kaplan, Chase Robinson, Michael Tasch, Tiffany Chen, Robert De Niro	ROBINSON00007061-62	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
320*	Text message, 3/8/2019 to 3/10/2019 involving Chase Robinson, Tom Harvey, and Michael Tasch	ROBINSON00007063	
321	Email, 3/11/2019 involving Chase Robinson, Tom Harvey, Tiffany Chen, Michael Tasch, Robin Chambers, and Michael Kaplan	ROBINSON00007068	FRE (Relevance)
322*	Email, 3/11/2019-3/12/2019 involving Chase Robinson, Tiffany Chen, Tom Harvey, Robert De Niro, and Michael Tasch	ROBINSON00007070-71	
323*	Email, 3/29/2019 involving Chase Robinson and Andrea Robinson	ROBINSON00007078	
324	Text message, 4/5/2019 involving Chase Robinson and Marianna Shafran	ROBINSON00007083	FRE 402 (Relevance)
325*	Email, 4/4/2019 involving Chase Robinson and Robert De Niro	ROBINSON00007085	
326*	Email, 4/6/2019 involving Tiffany Chen, Lulu White, Gillian Spear, Sabrina Weeks-Brittan, and Robert De Niro	ROBINSON00007087	
327*	Email, 4/6/2019 involving Chase Robinson to Robert De Niro	ROBINSON00007088	
328*	Text message, 5/29/2019-5/31/2019 involving Chase Robinson and Robert De Niro	ROBINSON00007092	
329	Email, 6/9/2019 involving Tom Harvey and Chase Robinson	ROBINSON00007093	Subject to redactions: FRE 402 (Relevance) ADVANCE RULING REQUESTED [by Plaintiff]
330	Email, 6/11/2019 involving Tom Harvey, Chase	ROBINSON00007101-02	Subject to redactions: FRE 402 (Relevance)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	Robinson, and Robert De Niro		
331*	Petty Cash Spreadsheet, 4/6/2017-12/22/2017	CANAL_0022626	
332	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007117	FRE 402 (Relevance)
333	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007118	FRE 402 (Relevance)
334	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007120	FRE 402 (Relevance)
335	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007121	FRE 402 (Relevance)
336	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007122	FRE 402 (Relevance)
337	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007123	FRE 402 (Relevance)
338*	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007126	
339*	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007127	
340*	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007128	
341*	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007129	
342*	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007132	
343	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007133	FRE 402 (Relevance)
344*	Voicemail from Robert De Niro to Chase Robinson	ROBINSON00007140	
345	Documents Relating to Flower Purchases	ROBINSON00006790-6883	FRE 402 (Relevance)
346	Emails, 2/5/2015 involving Chase Robinson and Michael Kaplan	CANAL_0013067	FRE 402 (Relevance; Statute of Limitations)
347	Email, 12/2/2016 involving Chase Robinson, Robert De Niro, Katherine Wernet, and Morgan Billington	CANAL_0016971	FRE 402 (Relevance)
348	Email, 12/10/2016 involving Chase Robinson, Robert De Niro, Katherine	CANAL_0017006	FRE 402 (Relevance)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
	Wernet, and Morgan Billington		
349*	Email, 3/6/2018 involving Chase Robinson and Robert De Niro	CANAL_0020803	
350*	Emails, 2/16/2018-3/9/2018 involving Chase Robinson, Amelia Brain, Gillian Spear, Michael Kaplan, and Morgan Billington	CANAL_0020857	
351	Emails, 4/13/2017-4/14/2017 involving Chase Robinson, Robert De Niro, Morgan Billington, and Gillian Spear	CANAL_0025806	FRE 402 (Relevance)
352*	Emails, 3/9/2018-4/19/2018 involving Chase Robinson and Gillian Spear	CANAL_0026162	
353*	Emails, 2/16/2018-7/13/2018 involving Chase Robinson, Gillian Spear, Morgan Billington, and Amelia Brain	CANAL_0026341	
354*	Email, 7/1/2017 involving Chase Robinson and Robert De Niro	CANAL_0046995	
355*	Email, 6/15/2014 involving Chase Robinson and Robert De Niro	ROBINSON00001855-56	
356	Email, 1/11/2016 involving Chase Robinson and Michael Kaplan	ROBINSON00002329	FRE 402 (Relevance; Statute of Limitations); FRE 403 (Prejudice)
357	Email, 10/29/2016 involving Chase Robinson	ROBINSON00002406	FRE 402 (Relevance); FRE 403 (Prejudice)
358	Email, 12/22/2018 involving Chase Robinson, Gillian Spear, Michael Kaplan, Sabrina Weeks-Brittan, and Lulu White	ROBINSON00004598-600	FRE 402 (Relevance)
359	Email, 1/4/2019 involving Chase Robinson	ROBINSON00004614	FRE 402 (Relevance)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
360	Email, 1/23/2019 involving Chase Robinson	ROBINSON00004627	FRE 402 (Relevance); FRE 801-802 (Hearsay)
361*	Email, 3/6/2018 involving Chase Robinson and Michael Tasch	ROBINSON00009370	
362	Email, 12/1/2016 involving Chase Robinson, Michael Tasch, Mark Bosswick, and Robert De Niro	ROBINSON00010181	FRE 402 (Relevance); FRE 403 (Prejudice)
363	Hand-written note by Chase Robinson	ROBINSON00011648	FRE 402 (Relevance); FRE 801-802 (Hearsay); FRE 403 (Prejudice); FRE 1002 (Best Evidence)
364*	Text message, 10/9/2019 involving Chase Robinson and Bryan Zak	ROBINSON00012262	
365	Text message, 1/22/2019 involving Michael Kaplan and Chase Robinson	ROBINSON00012284	FRE 402 (Relevance)
366	Text message, 3/5/2018 involving Chase Robinson and Robert De Niro	ROBINSON00013303	FRE 402 (Relevance); FRE 403 (Prejudice)
367	Email, 8/29/2018 involving Chase Robinson, Robert De Niro, and Gillian Spear	ROBINSON00012307	FRE 402 (Relevance)
368*	Email, 7/9/2013 involving Chase Robinson and Robert De Niro	ROBINSON00008019	
369*	Text message, 3/9/2018 involving Chase Robinson and Amelia Brain	ROBINSON00008944	
370*	Text message, 3/4/2018 involving Chase Robinson and Amelia Brain	ROBINSON00008967	
371*	Email, 3/6/2018 involving Chase Robinson and JJ (James) Imbriani	ROBINSON00010395	
372	Email, 3/6/2018 involving Chase Robinson, JJ (James) Imbriani, Robin Chambers	ROBINSON00011213	FRE 402 (Relevance); FRE 403 (Cumulative; Duplicative, as it overlaps with document ending in 10395)

Pl.'s Ex. No.	Description	Bates Nos.	Objections
373*	Text message, 3/12/2018 to 3/14/2018 involving Chase Robinson and Amelia Brain	ROBINSON00008966	
374	Emails, 10/8/2012-10/9-2012 involving Chase Robinson, Amelia Brain, Olivia Jampol, and Dan Harvey	ROBINSON00013262-63	FRE 402 (Relevance; Statute of Limitations)
375	Emails, 7/13/2009 involving Michael Kolonoski, Lisa Parker, Sandy O'Hearen, Katherine MacLean, and Chase Robinson	ROBINSON00009428	FRE 402 (Relevance; Statute of Limitations)
376	Emails, 11/17/2014 involving Chase Robinson, Victoria DeVincenzo, Michael Tasch, and Michael Kaplan	ROBINSON00013815	FRE 402 (Relevance; Statute of Limitations)
377	Check, 2/12/2015 involving Chase Robinson and Canal Productions	ROBINSON00011101	FRE 402 (Relevance; Statute of Limitations)
378	Emails, 6/29/2017 involving Chase Robinson, Robert De Niro, and Dan Harvey	ROBINSON00013445	FRE 402 (Relevance)
379*	Michael Kaplan Petty Cash Spreadsheet, 4/2017-12/2017	ROBINSON00021564	
380	Dr. Jessica Weiser-McCarthy Affidavit, Medical Records, and Invoices	ROBINSON00022887 ROBINSON00016395- ROBINSON00016435 CANAL_0049487- CANAL_049574	Untimely, as exhibit was not provided during discovery. FRE 402 (Relevance); FRE 701 (Speculative) Defendants reserve the right to further object based on (i) what portion Plaintiff seeks to introduce, as it is unclear what pages are being entered, and (ii) the purpose for which Plaintiff seeks to introduce it. Defendants further object because it constitutes

Pl.'s Ex. No.	Description	Bates Nos.	Objections
			attempted expert testimony from a person who was not designated. Fed. R. Civ. P. 26.
381	Dr. Kirsten O. Healy Affidavit, Medical Records, and Invoices	ROBINSON00022889, ROBINSON00022775- ROBINSON00022790	Untimely, as exhibit was not provided during discovery. FRE 402 (Relevance); FRE 701 (Speculative) Defendants reserve the right to further object based on (i) what portion Plaintiff seeks to introduce, as it is unclear what pages are being entered, and (ii) the purpose for which Plaintiff seeks to introduce it. Defendants further object because it constitutes attempted expert testimony from a person who was not designated. Fed. R. Civ. P. 26.
382	Dr. Kathleen Rein Affidavit, Medical Records, and Invoices	ROBINSON00022888, ROBINSON00016345- ROBINSON00016394, ROBINSON00016436- ROBINSON00016438, ROBINSON00022752- ROBINSON00022774 ROBINSON00022729- ROBINSON00022751, ROBINSON00022871-86, CANAL_049575- CANAL_049623	Untimely, as exhibit was not provided during discovery. FRE 402 (Relevance); FRE 403 (Prejudice); FRE 701 (Speculative) Defendants reserve the right to further object based on (i) what portion Plaintiff seeks to introduce, as it is unclear what pages are being entered, and (ii) the purpose for which Plaintiff seeks to introduce it. Defendants further object because it constitutes attempted expert testimony from a person who was not designated. Fed. R. Civ. P. 26.
383*	Emails, 3/2/2019-4/2/2019 involving Chase Robinson, Robert De Niro, and Tiffany Chen	CANAL_0046677-78	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
384*	Email, 6/10/2014 involving Chase Robinson and Amelia Brain	ROBINSON00006898	
385*	Emails, 1/24/2019 involving Chase Robinson and Lulu White	ROBINSON00006931	
386*	Emails, 3/4/2019 involving Chase Robinson, Tiffany Chen, Robert De Niro, Tom Harvey, and Michael Tasch	ROBINSON00007043-44	
387*	Emails, 3/4/2019 involving Chase Robinson, Tiffany Chen, Robert De Niro, and Tom Harvey	ROBINSON00007047-48	
388	Uber Receipt Emails, 2/5/2019-2/8/2019, 2/11/2019, 2/12/2019, 2/26/2019, 2/27/2019, 3/8/2019, 3/13/2019, 3/19/2019, 3/20/2019, 3/23/2019, 3/27/2019, 3/28/2019, 4/5/2019 involving Lulu White	CANAL_0028001-04, CANAL_0028017-20, CANAL_0028023-26, CANAL_0028036-39, CANAL_0028041-48, CANAL_0028062-65, CANAL_0028071-74, CANAL_0028148-59, CANAL_0028209-12, CANAL_0028222-25, CANAL_0028302-05, CANAL_0028322-25, CANAL_0028328-31, CANAL_0028433-36, CANAL_0028474-81, CANAL_0028513-16, ROBINSON00010728-31	
389	Terms & Conditions for Delta SkyMiles Transfers	ROBINSON00016439	FRE 402 (Relevance); FRE 901 (Authenticity); FRE 1002 (Best Evidence)
390	Chase Robinson's SkyMiles Account History (6/10/2016-12/31/2016)	ROBINSON00013203-13	
391	Chase Robinson's SkyMiles Account History (1/1/2017-12/31/2017)	ROBINSON00013191-202	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
392	Chase Robinson's SkyMiles Account History (1/1/2018-12/31/2018)	ROBINSON00013179-90	
393	Chase Robinson's SkyMiles Account History (1/1/2019-11/6/2019)	ROBINSON00013163-78	
394	Uber Receipt Emails, 2017-2019, involving Chase Robinson	ROBINSON00008999-9006, ROBINSON00009009-12, ROBINSON00009015-22, ROBINSON00009025-28, ROBINSON00009031-36, ROBINSON00009041-60, ROBINSON00009069-72, ROBINSON00009075-76, ROBINSON00009079-84, ROBINSON00009087-88, ROBINSON00009093-94, ROBINSON00009099-114, ROBINSON00009147-62, ROBINSON00009165-72, ROBINSON00009175-78, ROBINSON00009181-96, ROBINSON00009111-200, ROBINSON00009203-04, ROBINSON00009209-24, ROBINSON00009227-32, ROBINSON00009235-36, ROBINSON00009239-40, ROBINSON00009245-54, ROBINSON00009257-58, ROBINSON00009261-64, ROBINSON00009289-98, ROBINSON00010410-17, ROBINSON00010806-13	
395	Email, 4/6/2019, involving Tiffany Chen and Rachel Humphreys	CANAL_0046701	
396	Audio recording, 4/3/2021, involving Tom Harvey and Chase Robinson	ROBINSON00007181	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
397	Audio recording, 4/8/2021, involving Tom Harvey and Chase Robinson	ROBINSON00007195	
398	Audio recording, 4/9/2021, involving Tom Harvey and Chase Robinson	ROBINSON00007196	
399	Emails, 3/1/2018, involving Chase Robinson and James Imbriani	ROBINSON00010397-98	
400	Email, 3/5/2018 involving Chase Robinson and James Imbriani	ROBINSON00011212	
401	Email, 3/7/2018 involving Chase Robinson and James Imbriani	ROBINSON00011158-59	
402	Emails, 3/6/2018-3/9/2018 involving Chase Robinson, Juanita Contreras, Morgan Billington, and Gillian Spear	ROBINSON00011103-04	
403	Email, 3/11/2018 involving Chase Robinson	ROBINSON00013229	
404	Text message, 2/9/2018 involving Chase Robinson and Robin Chambers	ROBINSON00011203	
405	Emails, 2/15/2018 involving Chase Robinson and Elizabeth McGuire	ROBINSON00011204	
406	Text messages, 5/18/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048784-87	
407	Monthly calendars, 2012-2019		
408	Goldstein CV and List of Past Depositions & Trials		
409	Emails, 10/28/2019-11/1/2019, involving Sabrina Weeks-Brittan, Gillian Spear, Michael Tasch, and Mark Bosswick	CANAL_0025278-79	
410	Text messages, 5/21/2019, involving Tiffany Chen and Sabrina Weeks-Brittan	CANAL_0047972-74	

Pl.'s Ex. No.	Description	Bates Nos.	Objections
411	Text messages, 6/3/2019-6/4/2019, involving Gillian Spear, Michael Kaplan, and Sabrina Weeks-Brittan	CANAL_0047526-35	
412	Email, 6/27/2012, involving Chase Robinson and Michael Kaplan	ROBINSON00006896	
413	Email, 3/15/2014, involving Chase Robinson and Michael Kaplan	ROBINSON00006897	
414	Canal General Ledger Sample		
415	Plaintiff's Second Amended 30(b)(6) Deposition Notice		
416	Text messages, 3/9/2019 involving Robert De Niro and Tiffany Chen	CANAL_0048652-57	

Defendants' Reservation of Rights

Defendants reserve all rights to object to Plaintiff's exhibits on any grounds. Defendants further reserve all rights to amend their stated objections, including, without limitation, to add, remove, modify, and/or amend objections based on the Court's evidentiary rulings, the purposes for which Plaintiff seeks to introduce the exhibits, and in light of the evidence adduced at trial.